

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA**

JEFFERSON MORLEY  
1804 Kenyon Street, NW  
Washington, D.C. 20010

Plaintiff,

v.

BOARD OF GOVERNORS  
OF THE FEDERAL RESERVE SYSTEM  
20th C Street, NW  
Washington, D.C. 20551

Defendant.

Civil Action No. 19-797

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**COMPLAINT**

This is an action under the Freedom of Information Act (“FOIA”), 5 U.S.C. § 552, et seq., as amended, to seek production of agency records sought by the plaintiff Jefferson Morley from the defendant Board of Governors of the Federal Reserve System.

**JURISDICTION**

1. This Court has both subject matter jurisdiction over this action and personal jurisdiction over the defendant pursuant to 5 U.S.C. § 552(a)(4)(B) and 28 U.S.C. § 1331.

**VENUE**

2. Venue is appropriate under 5 U.S.C. § 552(a)(4)(B) and 28 U.S.C. § 1391.

**PARTIES**

3. Plaintiff Jefferson Morley (“Morley”) is an author and investigative reporter with 35 years’ worth of experience, and is a representative of the news media.

4. Defendant Board of Governors of the Federal Reserve System (“Federal Reserve Board”) is an agency within the meaning of 5 U.S.C. § 552(f), and is in possession and/or control of the records requested by the plaintiff that are the subject of this action.

**COUNT ONE (FEDERAL RESERVE BOARD)**

5. On February 5, 2019, Morley submitted a FOIA request to the Federal Reserve Board.

6. By e-mail dated February 14, 2019, the Federal Reserve Board acknowledged receipt of the FOIA request and designated it as Request No. F-2019-00084. By e-mail dated March 5, 2019, the Federal Reserve Board invoked its statutory right to extend its deadline to issue a substantive response until March 19, 2019.

7. No substantive response has been received as of today. Morley has constructively exhausted his administrative remedies.

WHEREFORE, plaintiff Jefferson Morley prays that this Court:

(1) Order the defendant Board of Governors of the Federal Reserve System to process and release to the plaintiff all responsive, non-exempt records;

(2) Award reasonable costs and attorney’s fees as provided in 5 U.S.C. § 552(a)(4)(E) and/or 28 U.S.C. § 2412(d);

(3) Expedite this action in every way pursuant to 28 U.S.C. § 1657(a); and

(4) Grant such other relief as the Court may deem just and proper.

Date: March 21, 2019

Respectfully submitted,

/s/

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